

# Exhibit C

1 Jack DiCanio (SBN 138782)  
Caroline Van Ness (SBN 281675)  
2 SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP  
3 525 University Avenue  
Palo Alto, California 94301  
4 Telephone: (650) 470-4500  
Facsimile: (650) 470-4570  
5 Email: jack.dicanio@skadden.com  
Email: caroline.vanness@skadden.com

6 Steven C. Sunshine (*pro hac vice*)  
7 Julia K. York (*pro hac vice*)  
SKADDEN, ARPS, SLATE, MEAGHER &  
8 FLOM LLP  
1440 New York Avenue, N.W.  
9 Washington, DC 20005-2111  
Telephone: (202) 371-7000  
10 Facsimile: (202) 393-5760  
Email: steven.sunshine@skadden.com  
11 Email: julia.york@skadden.com

12 *Counsel for Defendant Activision Blizzard, Inc.*

13  
14  
15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 FEDERAL TRADE COMMISSION,  
19 Plaintiff,

20 v.

21 MICROSOFT CORP.,  
and  
22 ACTIVISION BLIZZARD, INC.

23 Defendants.  
24  
25  
26  
27  
28

Case No. 3:23-cv-02880-JSC

**DECLARATION OF PAGE ROBINSON IN  
SUPPORT OF DEFENDANT ACTIVISION  
BLIZZARD, INC.'S ADMINISTRATIVE  
MOTION TO SEAL PORTIONS OF ITS  
ANSWER AND DEFENSES (Civil L.R. 79-  
5)**

Judge: Hon. Jacqueline Scott Corley

1 I, Page Robinson, declare as follows:

2 1. I am a Senior Director of Litigation and Intellectual Property at Activision  
3 Blizzard, Inc. (“Activision”). I submit this declaration in support of Activision’s  
4 Administrative Motion to Seal Portions of Its Answer and Defenses. In my role, I have  
5 personal knowledge of Activision’s use and protection of non-public, highly sensitive, and  
6 confidential business information, including the information at issue here.

7 2. I have personal knowledge of the facts set forth below, and I can and would  
8 competently testify to such facts if called to do so.

9 3. I have reviewed and am familiar with Activision’s Answer and Defenses,  
10 and the portions that contain information designated by Activision as “Confidential.” Such  
11 information is identified in Activision’s Administrative Motion to Seal Portions of Its  
12 Answer and Defenses (the “Administrative Motion”).

13 4. The portions identified in Activision’s Administrative Motion contain non-  
14 public and highly sensitive information, including, but not limited to, information  
15 reflecting Activision’s internal business data, business strategy, business partnerships, as  
16 well as the terms of a confidential agreement that Activision does not disclose to third  
17 parties.

18 5. This information could be used to injure Activision if made publicly  
19 available, and it would cause competitive harm to Activision if the above information was  
20 publicly disclosed. For example, disclosure of this information would give Activision’s  
21 competitors insight into Activision’s strategies, plans, and assessments regarding potential  
22 opportunities, and those competitors may alter their strategic plans or offerings if they  
23 knew Activision’s strategies and plans. Disclosure of this information would also harm  
24 Activision by allowing its competitors to circumvent the time and resources expended by  
25 Activision in developing its internal practices and strategies. Disclosure of this information  
26 would further harm Activision’s negotiating position with its business partners.

27

28



**SIGNATURE ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: June 30, 2023

/s/ Caroline Van Ness  
Caroline Van Ness